

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

DAVID GRAHAM GOODMAN,

Plaintiff,

v.

KENNETH W. STOLLE, ET AL.,

Defendants.

Civil Action No. 1:13-cv-540

DECLARATION OF LAUREN C. ANDREWS

I, Lauren C. Andrews, state as follows:

1. I am over twenty-one years of age, and I am competent to give this declaration. I have personal knowledge of the facts set forth in this declaration.

2. I am one of the attorneys representing Plaintiff David Graham Goodman in the above-captioned matter.

3. I submit this declaration in support of Plaintiff's Motion For Sanctions Pursuant To Rule 37(e) in order to place before the Court true and correct copies of certain documents that are relevant to this matter.

4. Attached hereto as Exhibit 1 is a true and correct copy of a webpage entitled "About VBCC" from VBSO.net, the website of the Virginia Beach Sheriff's Office (available at vbso.net/about-vbcc).

5. Attached hereto as Exhibit 2 are excerpts from a true and correct copy of the transcript of the October 12, 2021 deposition of David Goodman in this action.

6. Attached hereto as Exhibit 3 are excerpts from a true and correct copy of the transcript of the September 9, 2021 deposition of Curtis Hayes in this action.

7. Attached hereto as Exhibit 4 are excerpts from a true and correct copy of the transcript of the September 8, 2021 deposition of Linda Richie in this action.

8. Attached hereto as Exhibit 5 is a true and correct copy of a document produced by Sheriff Stolle during discovery in this action bearing the Bates label STOLLE 1348.

9. Attached hereto as Exhibit 6 are excerpts from a true and correct copy of the transcript of the September 10, 2021 deposition of Zachary Diggs in this action.

10. Attached hereto as Exhibit 7 are excerpts from a true and correct copy of the transcript of the September 8, 2021 deposition of Crystal Repass in this action.

11. Attached hereto as Exhibit 8 is a true and correct copy of a document produced by Sheriff Stolle during discovery in this action bearing Bates label STOLLE 0075.

12. Attached hereto as Exhibit 9 is a true and correct copy of a document produced by Sheriff Stolle during discovery in this action bearing Bates label STOLLE 0077.

13. Attached hereto as Exhibit 10 are excerpts from a true and correct copy of the transcript of the September 10, 2021 deposition of Todd Moissett in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 5, 2021.

/s/ Lauren C. Andrews
Lauren C. Andrews

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

Jeff Wayne Rosen
Lisa Ehrich
Jeffrey A. Hunn
PENDER & COWARD PC
222 Central Park Ave, Suite 400
Virginia Beach, VA 23462
Tel: (757) 490-6253
jrosen@pendercoward.com

Counsel for Defendants

/s/ Lauren C. Andrews
Lauren C. Andrews (VA Bar No. 92149)
ROBBINS, RUSSELL, ENGLERT,
ORSECK & UNTEREINER LLP
2000 K Street, N.W., 4th Floor
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
landrews@robbinsrussell.com

Counsel for Plaintiff